

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

---

**IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION**

**THIS DOCUMENT RELATES TO:**

*Rita Crawford v. Zhejiang Pharmaceutical  
Co., et al.*  
*(Case No. 1:20-cv-00763-RBK-JS)*

§  
§  
§  
§  
§  
§  
§  
§

**MDL NO. 2875**

**HON. ROBERT B. KUGLER**

---

**PLAINTIFFS' CROSS NOTICE OF VIDEOTAPED DEPOSITION OF AMR  
MOHAMED, M.D.**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 – Document 632), Plaintiff will take the cross deposition upon oral examination of Amr Mohamed, M.D., on **November 23, 2021 at 8:00 a.m. ET**, and continuing until completion, via Zoom video conference. Counsel who wish to attend remotely will have the option to do so using audio-visual conference technology and should contact Golkow Technologies at **scheduling@golkow.com** to arrange for login credentials to be sent to them prior to the deposition. The deposition will be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The court reporter and videographer will be an employee or agent of Golkow Technologies.

The deponent is further requested to bring to the deposition those items requested in Exhibit A attached hereto.

Additionally, in accordance with paragraph B (1) of C.M.O 20 (Dkt. 632), notice is hereby given that the undersigned will be the lead questioning attorney during the cross deposition. The attorney contact for the cross deposition is:

Marlene J. Goldenberg  
GoldenbergLaw, PLLC  
800 LaSalle Ave. Ste. 2150  
Minneapolis, MN 55402  
(612) 367-8900  
mjgoldenberg@goldenberglaw.com

Date: November 3, 2021

Respectfully submitted,

/s/ Marlene J. Goldenberg  
Marlene J. Goldenberg  
GoldenbergLaw, PLLC.  
800 LaSalle Ave. Ste. 2150  
Minneapolis, MN 55402  
(612) 367-8900  
mjgoldenberg@goldenberglaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3<sup>rd</sup> day of November 2021, I caused a true and correct copy of the foregoing Cross Notice of Videotaped Deposition of Amr Mohamed, M.D. to be served upon counsel of record. I further certify that a copy of the foregoing was served on Defendant's counsel by e-mail on November 3, 2021.

This 3<sup>rd</sup> day of November 2021.

/s/ Marlene J. Goldenberg  
*Attorney for Plaintiff*

**EXHIBIT A**

**Documents to be Produced**

You shall bring to the deposition the following documents that are in your possession, control or custody:

1. A current version of your CV/resume.
2. A list of all of your publications.
3. Any and all correspondence between you and any defendant in this MDL.